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October 27, 2021

**By ECF**

Hon. Loreta A. Preska  
Senior United States District Judge  
United States Courthouse  
500 Pearl Street, Room 2220  
New York, New York 10007

**Re: Andrea Sayger v. AssuredPartners Inc., et al.  
Civil Action No. 20-cv-8049 (LAP)**

Dear Judge Preska:

We represent the Plaintiff in the above-captioned matter, and we are writing to request an adjournment of the conference currently scheduled for November 3, 2021. No previous request for an extension of this conference has been made. For the reasons set forth herein, we respectfully request that the conference be adjourned for one week until November 10 or another date convenient for the Court.

We had originally asked Defendants' counsel to consent to a two-week adjournment of both the response time and the conference, to which they agreed. Upon reconsideration, we realized that we only require a week, and we would prefer to not ask the Court for any more time than is absolutely necessary. While Defendants' counsel agreed to the two-week extension, they have not yet agreed to the shorter period and we do not want to wait any longer to make our request to the Court.

At the conference on September 21, Your Honor ordered that the parties serve document requests by September 28, which both parties did. In an effort to respond to Defendants' requests and interrogatories, we reviewed with our client all the responsive documents that had been previously gathered. In reviewing these with our client, we discovered that there exist documents that may be responsive which have not yet been reviewed. Therefore, we request a one-week adjournment of the November 3 conference.

We are requesting the additional time to allow for as complete a search and production as possible and for the parties to review the productions in time for the next conference. We respectfully submit that the requested adjournment would serve the most expeditious use of judicial resources by enhancing the potential for a productive review

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and discussion of the claims and defenses herein as directed by Your Honor at the last conference.

Respectfully submitted,

D H CAVANAUGH ASSOCIATES

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By: \_\_\_\_\_  
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cc: Simone Francis, Esq. (via email)  
Kelly M. Cardin, Esq. (via email)

The conference is adjourned to Friday,  
November 12, 2021 at 9:00 a.m.

**SO ORDERED.**

Dated: October 28, 2021  
New York, New York



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LORETTA A. PRESKA  
Senior United States District Judge